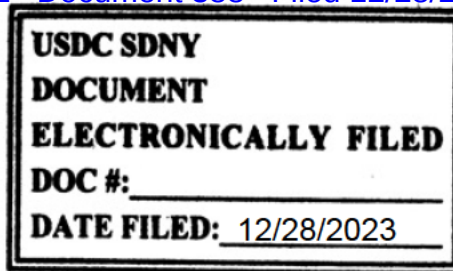


GIBSON DUNN



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December 21, 2023

Granted.

Hon. Robert W. Lehrburger  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

SO ORDERED:

12/28/2023

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

**Re: *Matter of Bulgari v. Bulgari*, No. 1:22-cv-05072-LGS-RWL**

Dear Judge Lehrburger:

The undersigned firms are counsel for Defendant Veronica Bulgari, in her capacity as Trustee of the Anna Bulgari Family Trusts in the above-captioned case. Pursuant to Your Honor's Rules for Redactions and Filing Under Seal, the parties met and conferred regarding "whether any or all of the redacted material" filed in connection with Defendant's Reply Memorandum of Law in Further Support of Her Motion for Summary Judgment "may or must be filed without redaction." Consistent with the Court's prior sealing orders (*see* ECF Nos. 343 & 380) and the parties' prior agreements, Defendant respectfully request the Court enter an order sealing the following categories of information in the documents filed under provisional seal at ECF Nos. 384, 385, 385-4, 385-7, 385-8, 385-9, 385-10, 385-11, 385-12, and 386:

1. Bank account numbers (other than the last three digits or letters)
2. Personal taxpayer-identification numbers (other than the last three digits)
3. Personal addresses (redacting only the street number and apartment number)
4. Personal non-work email addresses

Defendant proposes narrowly tailored redactions consistent with the Federal Rules of Civil Procedure and Second Circuit precedent. The Federal Rules permit redactions to taxpayer-identification numbers and financial-account numbers. *See* Fed. R. Civ. P. 5.2(a)(1), (4). Further, courts in this district have found that private information, such as personal home addresses and personal (non-work) email addresses, is sealable. *See, e.g., Valassis Commc'ns, Inc. v. News Corp.*, 2020 WL 2190708, at \*4 (S.D.N.Y. May 5, 2020) (holding that personal information such as cell phone numbers and home addresses should remain sealed); *Farstein v. Netflix, Inc.*, 2023 WL 6164293, \*3 (S.D.N.Y. Sept. 21, 2023) (sealing the personal contact information of non-parties). Plaintiff does not oppose the requested relief.

Accordingly, for the reasons set forth above, Defendant respectfully requests that the Court grant this motion to seal. Defendant will also submit the documents it seeks to seal with

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Hon. Robert W. Lehrburger  
Southern District of New York  
December 21, 2023  
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proposed redactions to the Court via email.

Respectfully submitted,

/s/ Mitchell A. Karlan

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*Attorneys for Defendant Veronica Bulgari*

cc: All counsel of record (via ECF).